

DAVID J. BERGER, State Bar No. 147645
 CATHERINE E. MORENO, State Bar No. 264517
 THOMAS J. MARTIN, State Bar No. 150039
 WILSON SONSINI GOODRICH & ROSATI
 Professional Corporation
 650 Page Mill Road
 Palo Alto, CA 94304-1050
 Telephone: (650) 493-9300
 Facsimile: (650) 565-5100
 Email: tmartin@wsgr.com

PAUL CHAVEZ, State Bar No. 241576
 ROBIN GOLDFADEN, State Bar No. 208055
 LAWYERS' COMMITTEE FOR CIVIL RIGHTS
 131 Steuart Street, Suite 400
 San Francisco, CA 94105
 Telephone: (415) 543-9444
 Facsimile: (415) 543-0296
 Email: pchavez@lccr.com

JULIA HARUMI MASS, State Bar No. 189649
 JINGNI (JENNY) ZHAO, State Bar No. 284684
 ALAN L. SCHLOSSER, State Bar No. 49957
 AMERICAN CIVIL LIBERTIES UNION FOUNDATION
 OF NORTHERN CALIFORNIA, INC.
 39 Drumm Street
 San Francisco, CA 94111
 Telephone: (415) 621-2493
 Facsimile: (415) 255-8437
 Email: jmass@aclunc.org

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UELIAN DE ABADIA-PEIXOTO, *et al.*,) Case No.: 3:11-cv-4001 RS

Plaintiffs,)

v.)

UNITED STATES DEPARTMENT OF
 HOMELAND SECURITY, *et al.*,)

Defendants.)

CLASS ACTION

**DECLARATION OF ANGIE YOUNG KIM
 IN SUPPORT OF PLAINTIFFS'
 UNOPPOSED MOTION FOR FINAL
 APPROVAL OF CLASS ACTION
 SETTLEMENT**

Date: April 10, 2014

Time: 1:30 p.m.

Judge: Honorable Richard Seeborg

Ctrm: 3, 17th Floor

1 I, Angie Young Kim, declare:

2 1. I am an attorney duly licensed to practice before this Court. I am an attorney at
3 the law firm of Wilson Sonsini Goodrich & Rosati, P.C. ("WSGR"), co-counsel for Plaintiffs
4 Uelian De Abadia-Peixoto, Esmar Cifuentes, Pedro Nolasco Jose and Mi Lian Wei in the above-
5 captioned action. I make this Declaration in support of Plaintiffs' Unopposed Motion in Support
6 of Final Approval of Class Action Settlement. I have personal knowledge of the facts set forth
7 herein and, if called as a witness, could and would testify competently thereto.

8 2. Pursuant to the Court's January 23, 2014 Preliminary Approval Order, on
9 January 30, 2014, I sent notice of the proposed settlement in this action in English, Spanish,
10 Chinese, and Punjabi via U.S. mail to all organizations included on the list of low-fee and free
11 legal services provided to respondents in removal proceedings before the San Francisco
12 Immigration Court.

13 3. These organizations included: Asian Law Caucus; Immigration Law Clinic at
14 U.C. Davis School of Law; Asian Pacific Island Legal Outreach; La Raza Centro Legal; Asylum
15 Program of the San Francisco at the Lawyers' Committee for Civil Rights; National Center for
16 Lesbian Rights; Catholic Charities Immigration Program; Santa Clara University School of Law
17 Civil Clinical Program; Central American Resource Center; Centro Legal de la Raza; Social
18 Justice Collaborative; Community Legal Services in East Palo Alto; and Samuel C. Marsh, Esq.

19 4. Attached as Exhibit 2 is a true and correct copy of such notice in English.

20 5. Plaintiffs' counsel at WSGR have not received any objections in writing, via
21 regular or electronic mail, or by telephone or voicemail to final approval of the parties'
22 settlement agreement. Nor have we received any requests for copies of the notice in any alternate
23 format.

1 I declare under penalty of perjury that the foregoing is true and correct to the best of my
2 knowledge. This declaration was executed on this 6th day of March, 2014, in Palo Alto,
3 California.

4
5 /s/ Angie Young Kim
Angie Young Kim

6
7 **SIGNATURE ATTESTATION**

8 I, Catherine E. Moreno, attest that I obtained the concurrence of Angie Young Kim in
9 filing this document. I declare under penalty of the laws of the United States that the foregoing
10 is true and correct.

11 Executed this 6th day of March, 2014 in Palo Alto, California.

12 /s/ Catherine E. Moreno
Catherine E. Moreno